

Exhibit J

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11**
:
MOTORS LIQUIDATION COMPANY, et al., : **Case No.: 09-50026 (REG)**
f/k/a General Motors Corp., et al. :
:
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING MOTION OF GENERAL MOTORS LLC
PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THIS
COURT’S JULY 5, 2009 SALE ORDER AND INJUNCTION
AGAINST PLAINTIFFS IN PRE-CLOSING ACCIDENT LAWSUITS**

Upon the Motion, dated August 1, 2014 (“**Motion**”), of General Motors LLC (“**New GM**”),¹ pursuant to Sections 105 and 363 of the Bankruptcy Code, seeking the entry of an order to enforce the Sale Order and Injunction, entered by the Court on July 5, 2009, by (a) directing the Plaintiffs in Pre-Closing Accident Lawsuits commenced against New GM, to cease and desist from further prosecuting against New GM, or otherwise pursuing against New GM, the claims asserted in the Pre-Closing Accident Lawsuits, and (b) directing Plaintiffs to dismiss the Pre-Closing Accident Lawsuits with prejudice forthwith, all as more fully set forth in the Motion; and due and proper notice of the Motion having been provided to counsel for the Plaintiffs, counsel for the GUC Trust and the U.S. Trustee, and it appearing that no other or further notice need be given; and upon (i) this Court having jurisdiction to consider the relief requested in the Motion pursuant to 28 U.S.C. §§ 157 and 1334, and Paragraph 71 of the Sale Order and Injunction, (ii) the relief requested in the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b), and (iii) venue of the Motion before this Court being proper pursuant to 28 U.S.C.

¹ Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

§§ 1408 and 1409; and a hearing (the “**Hearing**”) having been held with respect to the Motion on _____, 2014; and upon the record of the Hearing, the Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is hereby

ORDERED that the Motion is GRANTED as set forth herein; and it is further

ORDERED that the Plaintiffs shall dismiss, with prejudice, on or before _____, 2014, the Pre-Closing Accident Lawsuits set forth in Schedule “1” attached hereto; and it is further

ORDERED that the Plaintiffs and all persons acting in concert with them shall cease and desist from prosecuting the Pre-Closing Accident Lawsuits against New GM; and it is further

ORDERED that, within 10 business days after the entry of this Order, each of the Plaintiffs shall file with the Clerk of this Court evidence of the dismissal, with prejudice, of their individual Pre-Closing Accident Lawsuits; and it is further

ORDERED that New GM shall be authorized to serve this Order upon any additional party (and/or their attorney) who commences an action (“**Additional Action**”) against New GM that is substantially similar to the relief requested in the Pre-Closing Accident Lawsuits and, if such additional party fails or refuses to dismiss, with prejudice, such Additional Action, New GM shall be permitted to seek expedited relief in this Court seeking, among other things, to hold such party (and his or her attorney) in contempt of Court for violating the Sale Order and Injunction.

Dated: _____, 2014
New York, New York

UNITED STATES BANKRUPTCY JUDGE

SCHEDULE “1”

LIST OF PRE-CLOSING ACCIDENT LAWSUITS

[To Be Inserted After Court Ruling]